

March 28, 1999

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL


Please find enclosed an original and eleven (11) copies of my comments regarding the creation of a Low Power FM Class.

If you have any questions, please feel free to call me at (870) 933-8800 x12. You may also e-mail me at "trey@thefox1049.com".

My mailing address is:

Trey Stafford  
314 Union  
Jonesboro, AR 72401

Sincerely,



Casper P. Stafford, III  
Pressly Partnership Productions, Inc.  
Pressly Enterprises, LLC

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

**In the Matter of**

**Creation of a Low  
Power Radio Service**

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**MM Docket No. 99-25**

**RM-9208**

**RM-9242**

**Comments of  
Pressly Partnership Productions, Inc.  
Licensee of KDXY-FM Lake City, AR  
Licensee of KDEZ-FM Jonesboro, AR**

**Pressly Enterprises, LLC  
Licensee of KJBX-FM Trumann, AR  
Licensee of KDRS AM & FM Paragould, AR**

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My name is Trey Stafford. I am part of a company which owns radio stations located in the Northeast part of Arkansas. I am 37 years old. I have been in radio since I was nine years old, obtaining my third class license with broadcast endorsement at the age of twelve. To say that broadcasting has been a part of my entire life is truly an understatement.

This is also the first time I have personally filed comments with the Federal Communications Commission. In the past, I have watched various issues come before the body that governs my industry and, instead of filing comments myself, I depended on others in my industry, plus the wisdom of the Commission, to determine the best outcome. In the

case of the proposal to create a Low Power FM Service, I cannot simply stand by and watch.

My fundamental objection to the creation of a Low Power FM Service is the certain interference such a service would create to my station and other stations on the FM band. My market is rural compared to other larger markets. However, even in this "rural" area, there are signals at almost every position on the dial. To alter or drop the Commission's existing interference protection standards will result in a horrible interference situation with regard to existing signals. This will not serve the public interest. There will be a reduction of service to listeners as a result of the degradation of the FM band caused by this additional interference.

As I have stood and watched television prepare to enter the digital world with its HDTV technology, I have anxiously awaited the development of a digital technology for radio. IBOC, or In-Band, On Channel as it is called, has been our promise, our hope for the future. This IBOC service, as I understand it, would use the "sidebands" of the present analog signals on FM to deliver our digital signal, without use of additional spectrum. However, if the Commission allows this Low Power FM Class, and waters-down the interference protection that it currently maintains, I believe the future of IBOC, and the ability of radio to enter the digital transmission world sooner rather than later is in jeopardy.

It has been my understanding that one of the main reasons the Commission wants to begin a Low Power FM Class is so that urban communities and neighborhoods can be better served. It seems to be that this might not be achieved through the creation of this service. I admit, if the Commission altered or eliminated the second and third adjacent channel protections to allow Low Power FM, you would probably create some channel availabilities in a small market like mine. However, in the urban areas where the very communities and neighborhoods that the Commission wishes to serve are located, the spectrum is so cluttered

already that very few stations would be available. Thus, it seems foolish to me to spend the time and effort to create a service that could potentially be so damaging to the existing signals and yet not achieve the desired goal of creating a service to serve urban communities and neighborhoods.

I have also heard that the Commission desires to create a way to increase minority and female ownership of stations through the creation of this Low Power FM Service. What guarantee does the Commission have that minorities and females, as a group, are even interested in a Low Power FM Service? The economic viability of lower power stations is, at best, questionable. I personally believe that there is absolutely no guarantee that this service would serve as a way to increase minority and female ownership. Further, I believe that, if a service like this is created, the end result will be an effort to “network” these licenses by buying-up multiple licenses across the country. With all due respect, this “network” arrangement would be similar to what some religious organizations have done within the non-commercial band. For example, the American Family Association has turned-on literally hundreds of “translators” across the country networking their signal which originates from Tupelo, MS. I think the economic viability of a Low Power FM Service is not good, and that networking will be what’s left of a Low Power FM Service once the “smoke clears”. This is certainly not what the Commission desires from a Service such as this.

Finally, the 80-90 objection. I am sure I am not the only person giving comments that remembers. I went through Docket 80-90...The great fix for FM. The way to get more owners into the business. The way to get minorities and females into the business. Create more signals, more stations. That was the way. Well, I lived through it. It was not good. It was horrible for radio. Docket 80-90 destroyed the radio business. And, in the end,

the Telecommunications Act of 1996, which changed the ownership restrictions in the industry, was needed to save the industry...after Docket 80-90. I have been a part of the Arkansas Broadcasters Association since the early 1980s. I have known many minority and female owners of Arkansas radio stations. Up until a couple of years ago, there were several minority and female owners in Arkansas. What happened? They sold their stations to groups, allowed by the Telecomm Act. They made money selling their stations. They could not make money operating their stations. Why? Too many owners, too many signals.

I have heard Chairman Kennard speak. Mr. Chairman, you are awesome. When I heard you two years ago at the NAB State Leadership Conference in Washington, DC, I was impressed with you, the person. You were eloquent. You were commanding. You were.. impressive. I also heard your passion to create more minority and female ownership of stations in our industry. With all due respect Mr. Kennard, a Low Power FM Class is not the answer. It is not the answer because of the potentially devastating effect it will have on my stations from a technical standpoint, and from an ability to serve my communities. It is also not the answer because creating a Low Power FM Class, ultimately, will not result in increased minority and female ownership.

With great respect for the body which governs my industry, I am,

Sincerely,

A handwritten signature in black ink, reading "Casper P. Stafford, III". The signature is fluid and cursive, with the last name "Stafford" being the most prominent part.

Casper P. Stafford, III

Vice President/CFO Pressly Partnership Productions, Inc., licensee of  
KDXY-FM Lake City, AR; KDEZ-FM Jonesboro, AR

Manager Pressly Enterprises, LLC; licensee of KJBX-FM, Trumann, AR;  
KDRS AM & FM, Paragould, AR